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**BY ECF**

May 17, 2024

The Honorable Lee G. Dunst  
United States Magistrate Judge, EDNY  
100 Federal Plaza, Courtroom 830  
Central Islip, New York 11722

Re: *Hasper v. County of Nassau et. al.*  
20cv2349 (RER)(LGD)

Your Honor:

This office was recently retained by plaintiff William Hasper in the above referenced matter. Please accept this correspondence as the parties' joint status report.

The parties have discussed the status of discovery. Having just been retained and having the need to both obtain and review the complex file that we have recently inherited from prior counsel, we jointly request that the Court stay the pending discovery schedule for four (4) weeks.

We believe there is good cause for this brief extension to allow counsel the opportunity to better understand the current posture of fact discovery and determine the number of depositions outstanding. To that end, we jointly request that the scheduled June 13, 2024, status conference be used as a further discovery update, wherein we can better advise the Court of our respective positions or concerns advancing with discovery. The parties share the same priority of moving this case forward as expeditiously as possible.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

*Anthony M. La Pinta*

ANTHONY M. LA PINTA

cc: All Parties (By ECF)